The Honorable Marc L. Barreca
Chapter 7
Hearing Location: Courtroom 7106, Seattle
Hearing Date: January 6, 2012
Hearing Time: 9:30 a.m
Response Date: December 30, 2011

UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

In Re: ADAM R. GROSSMAN Debtor.	Chapter 7 No. 10-19817 TRUSTEE'S JOINDER AND RESPONSE TO INTERIM APPLICATION FOR COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR ATTORNEY FOR TRUSTEE

COMES NOW Ronald G. Brown, Chapter 7 Trustee, and joins in the application for compensation and reimbursement of expenses for Wood & Jones, P.S., attorneys for the trustee, as follows:

1. This case has been complex and the attorneys have spent considerable effort in investigation and contested proceedings to generate funds for the bankruptcy estate. HowIt does not appear appropriate at this time to pay the full amount of any administrative claim by counsel that may be approved by the court.

2. The estate is holding about $48,000. The estate is in the process of appointing an accountant to evaluate the tax consequences for the bankruptcy estate for the funds collected.

3. The proposed application and proposed disbursement would exhaust all funds in the bankruptcy estate. The trustee holds a claim for compensation as the Chapter 11 trustee prior to

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counsel's appointment as well as for services as the Chapter 7 trustee and the estate accountant would have a Chapter 7 administrative claim for his services. Since other administrative claims have not been determined and the tax consequences have not yet been evaluated, it does not appear appropriate at this time to pay the full amount of any interim administrative claim by counsel that may be approved by the court.

4. The claims bar deadline will expire February 14, 2012. The creditor claims as currently filed exceed $451,000, which includes at least $16,000 in priority tax claims. The court has not yet had an opportunity to review the claims in a claims hearing.

5. The trustee joins in requesting approval of the application, but respectfully proposes that the court defer ruling on disbursement of any fees and reimbursement of costs until after the claims are adjudicated, the court has an opportunity to determine any interim distribution to creditors, and any tax consequences to the bankruptcy estate have been determined.

DATED this 28th day of December, 2011.

/s/ *Ronald G. Brown*
Ronald G. Brown, WSBA #8816
Chapter 7 Trustee

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